



Comptroller General
of the United States
Washington, D.C. 20548

Decision

Matter of: [Air Force Purchase of Belt Buckles as Awards
for Participants in a Competition]

File: B-247687

Date: April 10, 1992

DIGEST

Under 10 U.S.C § 1125 (1988) and the Department of Defense's implementing regulation, the Air Force may purchase belt buckles to distribute to Major Command level winners of the annual "Peacekeeper Challenge" competition.

DECISION

This responds to a request for a decision from Capt. J. M. Ward, Chief, Finance and Accounting Branch, 542d Comptroller Squadron (MAC), Kirtland Air Force Base, New Mexico. Capt. Ward asks whether the Air Force may purchase belt buckles to be awarded to participants in the annual "Peacekeeper Challenge" competition. For the reasons stated below, we conclude that 10 U.S.C § 1125 (1988), and the Department of Defense's (DoD's) implementing regulation, authorizes the Air Force to purchase the belt buckles.

Background

Since 1980, the Air Force Special Policy Agency has annually sponsored the "Peacekeeper Challenge" competition.¹ The competition is intended to develop and show excellence in security police combat, shooting ability, tactical and professional skills. Winners of the competitions held at various Air Force Major Commands compete in an annual Air Force-wide competition in individual and team events. Each year, the Air Force has procured belt buckles to distribute as awards to the winners of the Major Command competitions, and other trophies and awards to distribute to the winners of the Air Force-wide competition.

¹The "Peacekeeper Challenge" competition was not held in 1991 because of the Air Force's involvement in Operation Desert Shield/Desert Storm.

Legal Analysis

Generally, agencies may not purchase items to be distributed as awards unless a statute specifically authorizes the award. E.g., 45 Comp. Gen. 199 (1965). Capt. Ward asks whether the Air Force's purchase of belt buckles is authorized and cites as precedent B-243025, May 2, 1991 (authorizing agency to purchase inscribed jackets to be used as incentive awards).

That decision concerns the Government Employees' Incentive Awards Act, 5 U.S.C §§ 4501-4507. We have held that the Act, and its implementing Office of Personnel Management regulations, authorize agencies to purchase various "merchandise-type" awards. E.g., 67 Comp. Gen. 349 (1988) (telephones of nominal value). However, the Government Employees Incentive Awards Act does not authorize awards to members of the armed forces. 5 U.S.C §§ 2105 and 4501(2); cf. B-184306, Aug. 27, 1980.

The statute relevant to Capt. Ward's request is 10 U.S.C § 1125, which authorizes the Secretary of Defense to

"award medals, trophies, badges, and similar devices to members, units, or agencies of an armed force under his jurisdiction for excellence in accomplishments or competitions related to that armed force"

The Secretary of Defense has delegated the authority granted by section 1125, including the authority to purchase trophies and similar devices, to the Secretaries of the Military Departments. DoD Directive 1348.19, "Award of Trophies and Similar Devices in Recognition of Accomplishments," May 12, 1989. In our view, a belt buckle of nominal value is a device sufficiently similar to a medal trophy or badge, and the "Peacekeeper Challenge" is a competition related to the Air Force as to fall within the ambit of 10 U.S.C. § 1125. Therefore, the Air Force is authorized by section 1125 and DoD's implementing regulation to purchase the requested belt buckles.

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Acting Comptroller General
of the United States

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